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Linda C. Smith

July 28, 1997

Karen Oill Moury
Deputy Small Business Advocate
Office of Small Business Advocate
Suite 1102, Commerce Building
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Re: Application of Pennsylvania Power & Light Company For
Approval Of Its Restructuring Plan Under Section 2806 of
the Public Utility Code Docket No. R-00973954

Dear Ms. Moury:

Enclosed please find the American Association of Retired
Persons Response to the Office of Small Business Advocate
Interrogatories, Set, I, numbered 1 through 5.

Very truly yours,

Linda C. Smith

Linda C. Smith

LCS:sdc

Enclosures

cc: Certificate of Service
Mr. Robert D. Knecht
Prothonotary (Certificate of Service Only)

CERTIFICATE OF SERVICE

I, Linda C. Smith, hereby certify that I have this day caused a true copy of the foregoing to be served upon the parties of record in Docket No. R-00973954 in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the parties listed below.

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Dated at Harrisburg, Pennsylvania, July 28, 1997.

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CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission
v.
Pennsylvania Power and Light Company
(Application for Approval of a Restructuring Plan)
Docket No. R-00973954

DOCUMENT
FOLDER

MEM

I hereby certify that I have this day served a true copy of the foregoing documents, OCA's Responses to OSBA's Interrogatories Set I, Numbers 5-6 addressed to Richard LaCapra and Numbers 7-9, addressed to Lee Smith upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 28th day of July, 1997.

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July 28, 1997

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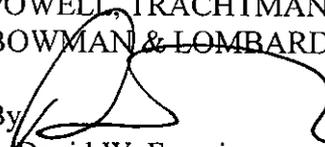
RE: **Mount Joy Wire Corporation v. Pennsylvania Power & Light Company;**
Docket No. R-00973954

Dear Mr. McNulty:

Enclosed for filing is an original and four copies of Mount Joy Wire Corporation's Petition to Join as a Party to the Intervention of Caradon Mideast Aluminum and Metal Industries, Inc. Please time stamp the extra copy and return. Please note that a courtesy copy is being sent to Administrative Law Judge George M. Kashi.

Very truly yours,

POWELL, TRACHTMAN, LOGAN, CARRLE,
BOWMAN & LOMBARDO, P.C.

By 
David W. Francis

DWF/mak
Enclosures

cc: ALJ George M. Kashi
Service List

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN THE MATTER OF PENNSYLVANIA
POWER & LIGHT COMPANY'S
RESTRUCTURING PLAN

DOCKET NO. R-00973954

MOUNT JOY WIRE CORPORATION'S PETITION TO JOIN AS A PARTY TO THE
INTERVENTION OF CARADON MIDEAST ALUMINUM, METAL INDUSTRIES, INC.,
AND THE QUAKER OATS COMPANY

1. The name and address of Petitioner is:

Mount Joy Wire Corporation
1000 E. Main Street
Mount Joy, PA 17522

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2. Petitioner's attorney is:

David W. Francis
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3. On April 1, 1997 Pennsylvania Power and Light Company ("PP&L") filed its restructuring plan ("PP&L's plan") pursuant to the provisions of the Electricity Generator Customer Choice and Competition Act.

4. PP&L's plan calls for, *inter alia*, a significant change in the way PP&L will be required to calculate interruptible power for all customers served on the interruptible rate. Specifically, PP&L's plan calls for the deletion of the definition of interruptible power from each interruptible rate schedule. Currently, the tariff requires PP&L to calculate interruptible power as "the twelve month average of each customer's monthly Maximum On-Peak demand less the customer's contract Firm power level." Under PP&L's proposal, PP&L will calculate the

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interruptible power as the highest on-peak demand for each customer in the previous 12-months less the customer's contract firm power level.

5. In the direct testimony of Mr. Oliver Kasper submitted to the Commission, he stated,

The Company consistently has calculated the amount of available interruptible load as a customer's maximum actual annual demand (in any 12-month period) and the customer's firm contract demand. This is consistent with the underlying purpose of interruptible load (to reduce peak demand) and how the Company calculates interruptible load as a capacity reserve obligation in the Pennsylvania-New Jersey-Maryland Interconnection.

Unfortunately, the definition of the cap in the Company's tariff has created some confusion and has led some customers to propose a substantially different method for calculating interruptible load based upon 12-month monthly average data. This alternative definition is inconsistent with how the Company has always calculated interruptible load, completely at odds with the purpose of and need for interruptible load, and substantially understates the amount of interruptible load on the Company's system. If this alternative definition were adopted, it would force the Company to contract for excessive amounts of interruptible load to the detriment of the Company and its other customers. To avoid continued controversy, the Company seeks to remove the definition from the tariff.

6. Upon information and belief, the customers who have allegedly proposed a substantially different method for calculating the interruptible load includes Mount Joy Wire Corporation.

7. Presently pending before this Commission is a complaint filed by Mount Joy Wire Corporation against PP&L that requests PP&L be required to retroactively place Mount Joy Wire Corporation on the interruptible rate commensurate with its request for interruptible power in September, 1995. PP&L admits that the twelve month average of each customer's monthly

maximum on-peak demand less the customer's contract firm power level has never exceeded the 500 MW cap in the tariff.

8. Mount Joy denies that PP&L has always calculated interruptible power according to the methodology suggested in its filing. In PP&L's rate case at Docket no. R-00943271, Mr. Oliver G. Kasper testified as to how the 500 MW cap should be calculated:

PP&L is proposing a cap of 500 MW of non-coincident interruptible load. This is a 12 month rolling average of the sum of the individual customers average monthly maximum demands minus the sum of the individual contracted firm demands.

9. Mount Joys also denies that the methodology it proposes (and currently required) for the calculation of interruptible power is inconsistent with the underlying purpose of interruptible load or substantially understating of amount of interruptible load on the Company's system. To the contrary, according to PP&L's methodology, PP&L will continue to carry a customer's interruptible load for the purposes of the 500 MW cap even if the resource is no longer available. By way of example, according to PP&L's methodology, it continued to count Bethlehem Steel's basic oxygen furnace interruptible capacity toward the 500 MW cap for 12 full months after it closed. Accordingly, PP&L's methodology substantially overstates the amount of interruptible load being carried on the system.

10. Upon information and belief, PP&L is attempting to resolve claims by companies such as Mount Joy in this proceeding without their participation.

11. Any determination in this matter supporting PP&L's proposed "underlying purpose and intent of interruptible load" or methodology for calculating interruptible load may have a substantially adverse impact upon Mount Joy's claim.

12. Further, any determination in this matter supporting PP&L's proposed methodology for calculating interruptible load may have a substantially adverse impact upon Mount Joys' ability to increase its interruptible power requirements through economic development.

13. On April 29, 1997 Caradon Mideast Aluminum, a division of Caradon America Inc., ("Caradon") and Metal Industries, Inc. ("Metal Industries") filed a petition to intervene in this matter. Both are interruptible customers who presently have pending before the Commission complaints requesting a retroactive application of the interruptible rate in accordance with the current language of the tariff.

14. On June 17, 1997 an Order was entered granting Caradon and Metal Industries petition to intervene.

15. On July 15, 1997 The Quaker Oats Company ("Quaker Oats") filed a petition to intervene in this matter. Quaker Oats is also an interruptible customer who presently has pending before the Commission a complaint requesting retroactive application of the interruptible rate in accordance with the current language of the tariff.

16. Mount Joy's petition is to join Caradon, Metal Industries, and Quaker Oats intervention, in so far as they have similar interests in this case. However, in the event Caradon, Metal Industries and/or Quaker were to resolve their differences with PP&L between now and trial, Mount Joy's interests would not be adequately represented by the existing participants in the proceedings.

17. Mount Joy shares counsel with Caradon, Metal Industries, and Quaker Oats; accordingly it is anticipated that Mount Joy's participation in this case will be jointly with

Caradon, Metal Industries, and Quaker, and that there will no other impact to this case, nor increase in the amount of cross-examination expected of PP&L's witnesses.

18. In the alternative, in the event that Caradon, Metal Industries and/or Quaker Oats were to settle their respective disputes with PP&L and withdraw from this intervention prior to this petition being acted upon, Mount Joy respectfully requests that this be treated as a petition for intervention.

WHEREFORE, Mount Joy company respectfully requests that they be permitted to join in the intervention of Caradon Mideast Aluminum, Metal Industries, and Quaker Oats in this matter.

Respectfully Submitted,

POWELL, TRACHTMAN, LOGAN, CARRLE,
BOWMAN & LOMBARDO, P.C.

By 

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DATE: July 28, 1997

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 1997, a copy of Mount Joy Wire Corporation's Petition to Join as a Party to the Intervention of Caradon Mideast Aluminum, Metal Industries, Inc. and the Quaker Oats Company was served upon the following person(s) by first class U.S. Mail, postage prepaid.

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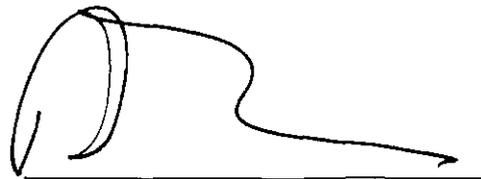
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David W. Francis

Date: July 28, 1997

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ALJ APPEARANCE SHEET

ALJ Hearing Report

MEM

Docket No. R-00973954

Case Name PENNSYLVANIA POWER & LIGHT COMPANY

Location HARRISBURG

Date JULY 15, 1997

ALJ GEORGE M. KASHI

Reporting Firm Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held YES NO

Hearing Held YES NO

Testimony Taken YES NO

Transcript Due YES NO

Hearing Concluded YES NO

Further Hearing Needed YES NO

Estimated Add'l Days _____

RECORD CLOSED YES NO

DATE _____

Briefs to be Filed YES NO

BENCH DECISION YES NO

PA.P.U.C. PROTHONOTARY'S OFFICE

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REMARKS: Hearings 8/18 - 31

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✓ Stephen M. Hladik Caplan & Lubner, LLP 40 Darby Road Paoli, PA 19438 Telephone No. 610-640-1200	40 Darby Road City Paoli State PA Zip 19438	Schuylkill Energy Resources, Inc. Gilberton Power Co.
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ALJ APPEARANCE SHEET

ALJ Hearing Report

MEM

Docket No. R-00973954

Case Name PENNSYLVANIA POWER & LIGHT COMPANY

Location HARRISBURG

Date MAY 30, 1997

ALJ GEORGE M. KASHI

Reporting Firm Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held YES NO

Hearing Held YES NO

Testimony Taken YES NO

Transcript Due YES NO

Hearing Concluded YES NO

Further Hearing Needed YES NO

DOCUMENT FOLDER

Estimated Add'l Days

RECORD CLOSED YES NO

Briefs to be Filed YES NO

DATE

BENCH DECISION YES NO

DATE

REMARKS:

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JUL 31 1997

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CERTIFICATE OF SERVICE

KJR

Re: Pennsylvania Public Utility Commission
v.
Pennsylvania Power and Light Company
(Application for Approval of a Restructuring Plan)
Docket No. R-00973954

DOCUMENT
FOLDER

I hereby certify that I have this day served a true copy of the foregoing documents, OCA's Responses to OSBA's Interrogatories Set I, Numbers 10-11, addressed to Nancy Brockway upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 29th day of July, 1997.

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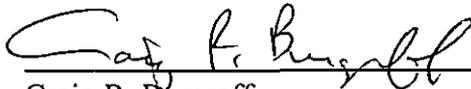
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COMMONWEALTH OF PENNSYLVANIA

DATE: July 29, 1997

SUBJECT: Applications for Approval
of Restructuring Plans

TO: Office of Administrative Law Judge

FROM: *WJZ* James J. McNulty, Acting Secretary

MEM

R-00973953 PECO ENERGY COMPANY
RESTRUCTURING PLAN

R-00973954 PENNSYLVANIA POWER & LIGHT COMPANY
RESTRUCTURING PLAN

Attached is copy of a Petition to Intervene of the Pennsylvania Association of Plumbing, Heating, Cooling Contractors, Inc. with a Motion to Appear Pro Hac Vice on Behalf of Intervenor for Usher Fogel filed in connection with the above docketed proceedings.

This matter is assigned to your Office for appropriate action.

Attachment

cc: OTS

wjz

DOCKETED

JUL 31 1997

**DOCUMENT
FOLDER**

COMMONWEALTH OF PENNSYLVANIA

DATE: July 29, 1997

SUBJECT: Applications for Approval
of Restructuring Plans

TO: Office of Administrative Law Judge

MEM

FROM: *WJZ* James J. McNulty, Acting Secretary

R-00974008 METROPOLITAN EDISON COMPANY
RESTRUCTURING PLAN
R-00973953 PECO ENERGY COMPANY
RESTRUCTURING PLAN
R-00974009 PENNSYLVANIA ELECTRIC COMPANY
RESTRUCTURING PLAN
R-00973954 PENNSYLVANIA POWER & LIGHT COMPANY
RESTRUCTURING PLAN

Attached is copy of a Motion for Leave to Intervene
Out of Time of ERI Services, Inc. filed in connection
with the above docketed proceedings.

This matter is assigned to your Office for
appropriate action.

Attachment

cc: OTS

wjz

1005
JUL 30 1997
DOCUMENT
FOLDER

DATE: July 30, 1997

SUBJECT: R-00973954

TO: Office of Administrative Law Judge

FROM: *WJZ* James J. McNulty, Acting Secretary

MEM

PENNSYLVANIA POWER & LIGHT COMPANY
RESTRUCTURING PLAN

Attached is copy of Mount Joy Wire Corporation's Petition to Join as a Party to the Intervention of Caradon Mideast Aluminum, Metal Industries, Inc., and The Quaker Oats Company filed in connection with the above docketed proceeding.

This matter is assigned to your Office for appropriate action.

Attachment

cc: OTS

wjz

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JUL 31 1997

**DOCUMENT
FOLDER**

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July 30, 1997

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VIA FEDERAL EXPRESS

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**Re: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light Company
- Application of Pennsylvania Power & Light Company for Approval of its
Restructuring Plan under Section 2806 of the Public Utility Code;
Docket No. R-00973954**

Dear Mr. Russell:

Enclosed are the responses of the PP&L Industrial Customer Alliance ("PPLICA") to Pennsylvania Power & Light Company's Interrogatories and Requests for Documents - Set II, Nos. 17, 25, 34, 41, 48 and 50.

Very truly yours,

McNEES, WALLACE & NURICK

By *Pamela C. Polacek*
Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

PCP/jb

Enclosures

c: Certificate of Service
James J. McNulty, Prothonotary (transmittal letter and Certificate of Service only)

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing Responses to Interrogatories upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Page 2

Docket No. R-00973954

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CERTIFICATE OF SERVICE

Page 3

Docket No. R-00973954

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Page 4

Docket No. R-00973954

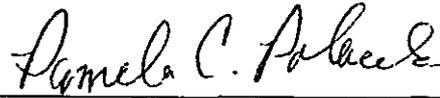
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Pamela C. Polacek, Esq.

Counsel to PP&L Industrial Customer Alliance

Dated this 30th day of July, 1997, at Harrisburg, Pennsylvania.

RECEIVED
97 JUL 30 PM 1:57
P.A.P.U.C.
PROTHONOTARY'S OFFICE



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

July 31, 1997

In Re: **R-00973954**

(See letter dated 07/24/97)

Pennsylvania Power & Light Company

Application for approval of a Restructuring Plan.

Hearing Notice

KJR

This is to inform you that Public Input Hearings on the above-captioned case will be held as follows:

Tuesday, September 2, 1997 at 7:00 p.m.

Brunswick Hotel
Lancaster Hall
Queen and Chestnut Streets
PO Box 749
Lancaster, Pennsylvania 17068
Contact Person: Stacey (717) 397-4801
Fax: (717) 397-4991

Wednesday, September 3, 1997 at 7:00 p.m.

Town Hall
Council Chambers
10 East Church Street
Bethlehem, Pennsylvania 18018
Contact Person: Charles Brown (610) 865-7079
Fax: (610) 865-7019

Thursday, September 4, 1997 at 7:00 p.m.

First Floor
Scranton State Office Building
100 Lackawanna Avenue
Scranton, Pennsylvania 18503
Contact Person: Renee Quinn (717) 963-4817

ROCKETED
AUG 04 1997

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Presiding Officer: **Administrative Law Judge George M. Kashi**
P.O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 783-5452

Please mark your records accordingly.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired:
1-800-654-5988.

pc: **Chairman Quain**
 Vice Chairman Bloom
 Commission Hanger
 Commissioner Rolka
 Commissioner Brownell
 Judge Kashi
 Kevin Cadden - BPL 111
 John Frazier - BPL 101
 Office of Trial Staff (2)
 Consumer Advocate
 Small Business Advocate
 Bill Barrett - FUS
 Norma Lewis
 Steve L. Springer, Scheduling Officer
 Beth Plantz
 Docket Section
 Calendar File

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DIRECT DIAL NUMBER:
(717) 237-7172

000271

July 31, 1997

VIA E-MAIL AND FACSIMILE

Paul E. Russell, Esquire
Pennsylvania Power & Light Company
2 North 9th Street
Allentown, PA 18101

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PROTHOROTARY'S OFFICE

KJR
97 AUG -4 PM 12:12

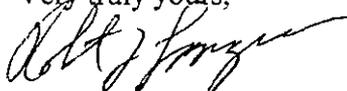
RE: Application of Pennsylvania Power & Light Company
for Approval of its Restructuring Plan Under Section 2806
of the Public Utility Code, Docket No. R-00973954

Dear Paul:

Enclosed please find Enron Power Marketing, Inc.'s answers to PP&L's Interrogatories, Set I, nos. 1, 2 and 35-59. As per our agreement the interrogatories directed to Dr. John Mayo (3-34) will be responded to by August 7, 1997 and PP&L shall have the right to file additional rebuttal testimony in response to said interrogatories.

If you have any questions or concerns regarding this matter feel free to contact the undersigned at your convenience.

Very truly yours,



Robert J. Longwell

For WOLF, BLOCK, SCHORR and SOLIS-COHEN, L.L.P.

RJL/jlg

Enclosures

cc: James McNulty, Acting Secretary (Cert. of Service only)
Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Alan Kohler

Dated: July 31, 1997

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July 31, 1997

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000367

James McNulty
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KJR

RE: Application of PP&L Energy Company for Approval
of its Restructuring Plan, Docket No. R-00973954

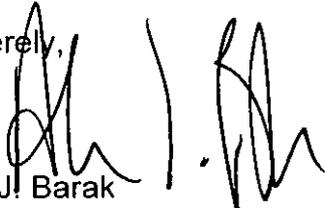
Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying our responses to the OSBA that the Environmentalists served on the active participants in this proceeding.

Please also date stamp the enclosed copy marked for our office files, and return it to us in the envelope provided.

If you have any questions regarding this letter, please do not hesitate to contact us.

Sincerely,


Alan J. Barak

Attachments

97 AUG - 4 8:12:46
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PROTHONOTARY OFFICE

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITIES COMMISSION

Application of Pennsylvania Power & Light Company)
for Approval of its Restructuring Plan Under Section)
2806 of the Public Utility Code)

Docket No. R-00973954

DOCKETED
AUG 05 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Environmentalists' responses to the Office of Small Business Advocates Interrogatories, Items 1 through 5, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Sec. 1.54, in the manner and upon the persons listed below.

Dated this 31st day of July, 1997.

BY FAX AND U.S. MAIL

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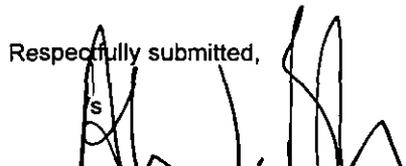
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Respectfully submitted,


Alan J. Barak (Sup Ct #67886)

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August 1, 1997

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PAUL E. RUSSELL

7 AUG - 1 PM 1:46

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KJR

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VIA FEDERAL EXPRESS

Re: **Pennsylvania Public Utility Commission v. Pennsylvania Power & Light Company**
- Application of Pennsylvania Power & Light Company for Approval of its
Restructuring Plan under Section 2806 of the Public Utility Code;
Docket No. R-00973954

Dear Mr. Russell:

Enclosed are the responses of the PP&L Industrial Customer Alliance ("PPLICA") to Pennsylvania Power & Light Company's Interrogatories and Requests for Documents - Set II, Nos. 49, 51 and 52.

Very truly yours,

McNEES, WALLACE & NURICK

By *Pamela C. Polacek*
Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

PCP/clc

Enclosures

c: Certificate of Service
James J. McNulty, Prothonotary (transmittal letter and Certificate of Service only)

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing Responses to Interrogatories upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

DOCKETED
JUN 05 1997

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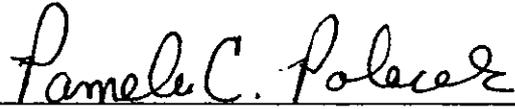
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